UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DEC 31 2008

Mr. Charles Martin
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, Virginia 23218

Dear Mr. Martin:

Thank you for the opportunity to comment on the Virginia Department of Environmental Quality's (VA DEQ) guidance memo entitled, *Monitoring of Point Sources Using Low-Level PCB Method 1668A for TMDL Development*. Enclosed are U.S. Environmental Protection Agency (EPA), Region III's comments on the memo. If you have any questions, feel free to contact me at 215-814-5737.

Sincerely,

Gregory Voigt
Office of Standards Assessment and TMDLs

Enclosure

JAN 07 2009

USEPA Region III Comments on VADEQ PCB Point Source Monitoring Guidance

Comments provided by:
Evelyn MacKnight
USEPA Region III
215-814-5717

I think that the details on number of samples, etc. are similar to those that we are using in PA, but it looks like one-time sampling. Is that what is/should be envisioned when they have a TMDL in place?

I'm not sure that facilities could accurately certify that PCBs were never present on site since they are found in light ballast, paint, caulk, electrical equipment, etc. We had discussions about Philadelphia's pretreatment program on this issue. I still think that they should require a one-time screening of some sort.

John, I'll leave the details up to you, but it would be good to have monitoring/sampling for industrial users to POTWs, and then there are the regular pretreatment requirements for PCBs that probably need some clarification.

Lastly, there was some discussion of modifying 1668(a), so this might refer to the most sensitive/current method to be used

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Comments provided by:
Brian Trulear
USEPA Region III
215-814-5723

It appears that this document is primarily addressing the gathering of data to help develop TMDLs. Under that scenario, the one time sampling may be ok. However, to address the monitoring required after the TMDL has been established, this document should specify that NPDES permits require annual monitoring. This could be annual monitoring of any combination of wet and/or dry samples. The suggested permit language in Appendix B on page B3 suggests that it could be used for TMDL implementation. Permits implementing TMDLs need a minimum of annual monitoring [40 CFR 122.44(i)(2)]. Permits being reissued in the Delaware to implement the TMDL are requiring PCB monitoring using the annual frequency.

I also agree with you regarding the exemption of some dischargers from any monitoring for TMDL development. If there is a low risk of PCBs in the discharge, the discharger should provide monitoring data to verify. If no data is provided, I assume a TMDL would be developed without that discharge being given a PCB WLA. That would mean the facility would get a zero discharge requirement in their permit. Any TMDL development should have all dischargers identified and screened for potential discharge of PCBs.

I did hear some talk about a "1668B". It may make sense for the DEQ guidance document to refer to "1668A or any later revision".

The column "Frequency" has more information in it than frequency criteria. Possibly delete the extra material or rename the column to "Requirements and Frequency".

Quality Control Item	Frequency	Acceptance Criteria	Corrective Action
Sample Collection, Preservation, Storage and Holding Times, Equipment Blank	Two bullets about bottle cleanliness guidelines are not about frequency. Remove from this column and put into Acceptance Criteria column • Documentation showing the traceability …. • Bottle Cleanliness ….	The criteria ½ of the laboratory reporting level is a good goal – but may not be achievable all the time. The requirements in Attachment 1.B are more reasonable. I am concerned VA will create a situation where a lab is reluctant to report blank contamination.	Refer to Attachment 1.B – this attachment has acceptance criteria and corrective action.
These 3 QC Items are the same and can be grouped together to limit redundancy. • Retention Time Calibration • Retention Times • GC Resolution and minimum analysis time	Retention Time Calibration The first two bullets do not pertain to frequency. Reword the third bullet as following • Monitor the RT for all 209 congeners by injecting the diluted combined 209-congener solution (Section 7.10.2.2) every 12 hours with continuing calibration (Section 15).	The reason the SPB-Octyl column is highly recommended is because it is the only column known to separate all the WHO congeners from the other homologs. The 209 congener solution (Section 7.10.2.2) serves two main purposes in the method. First to establish RT for all the congeners and second to provide a single point calibration for all the congeners not in the Toxics/LOC mix. Table 6 criteria for continuing calibration must be met if this standard is used as a calibration check. I personally do not use the 209 mix for calibration. I am helping rewrite 1668A in this regard. I would prefer this standard be used	I like the NOTE: that allows for the 209 criteria to be obsolete as I have had 209 elute before 55 minutes but everything else is fine.

Otherwise, I had no other comments. A lot of this information comes from DRBC and what has already been established. It makes sense for DEQ not to reinvent the wheel, so to speak. Question is, how do we get DCR to develop a PCB monitoring protocol for MS4s, since this document expressly states that it does not apply to the MS4 program implemented by DCR?

Comments provided by:
Larry Merrill
USEPA Region III
215-814-5452

1. VADEQ has appropriately characterized the status of 1668a and the inclusion of the information supplied by Brian Trulear from the NPDES program in the appendix is a good step.

2. I did not see any recommendation on the interval between samples for those facilities that will be required to take more than 1 wet or dry sample. I do not know if this is a concern but it might be appropriate to ask VADEQ if they have any recommendations on the spacing of sampling events over the required overall timing period specified in Section B. Monitoring Frequency.

3. For your information, the expected cost per sample analysis using method 1668a is over $400 according to a national registry of methods.

Comments provided by:
Stevie Wilding
USEPA Region III
410-305-2606

Stevie Wilding, December 19, 2008

All my comments will be limited to the use of Method 1668A and the criteria listed in Appendix D.

Method 1668A is being revised and EPA Office of Water is working hard to get this method promulgated so there will no longer be an argument on the viability and reliability of this method. With that said – errors in the method will be fixed and more flexibility in the method to allow a more performance base approach.

VADEQ has misinterpreted some of the criteria in Method 1668A and some of the criteria could change in the near future. Instead of spelling out the acceptance criteria in QC Table in Appendix D – it would be better to reference the Section in the Method. If sections of Method 1668A are referenced in the Acceptance Criteria -- the guidance document should need little change when changes are made to Method 1668A.

Quality Control Item	Frequency	Acceptance Criteria	Corrective Action
		as a RT standard. The calibration of "other" congeners could be treated like the non-2378 dioxin congeners in Method 1613 (Section 17.1.3). The Dioxin method uses an average RRF of the homologs present in the LOC Mix My reasons for the deviation from the method: 1. There is only one vendor (Accustandard) that sells all 209 congeners. There is no way to verify the concentrations they provide with a second source. NELAC certification requires a second source verification of standards. 2. Making a precise standard is very tedious – especially when you are working the µL volumes. Region III analysis of unknown Performance Testing (PT) samples was within 90% accuracy when using an average RF from homologs present in the Toxics/LOC mix.	
Mass Spectrometer Resolution	Beginning and end of each shift (Section 15.2)	A minimum resolving power of 10,000 at m/z 330.9792. (Section 10.2.1) The resolution must be ≥ 8,000 throughout the mass range (Section 10.2.3)	Samples affected by poor resolution should be reanalyzed.